

August 8, 2025

**Response To Judge's Order, Docket #583 - And Request For Clarification - And Request For Extensions - And Request To Withdraw Protective Order**

Dear Judge Liman,

I - Mario Armando Lavandeira, Jr., known professionally as Perez Hilton - write as a nonparty in Lively v. Wayfarer Studios LLC (1:24-cv-10049) in response to your order about me - docket #583.

In this order today, you write. "The Court is aware that Lavandeira has filed a motion to quash in the United States District Court for the District of Nevada and that Lavandeira has taken the position that he will not otherwise respond to Lively's cross motion in this Court. Dkt. Nos. 558, 578–79. However, Lively also has a right to have her cross motion decided."

As I am aware, your Honor likes to cite the law, cases and rulings, in your orders. Just today - in docket number #582 granting Ms. Lively's motion to strike - you cited plenty of case law for why striking was appropriate.

In this order pertaining to me, however, you cited no cases or rulings for why Ms. Lively has a *right* to have her cross motion decided in YOUR court when you, she and her legal team are all well aware of my previously filed motion to quash in Nevada.

It is my understanding that judges interpret the law - they don't invent the law. So, if you can please point me in the correct direction of the appropriate case law that proves Ms. Lively has a right to have her cross motion decided in your court when there is already pre-existing litigation with regards to this improper subpoena in question, that would be more than appreciated. It is imperative.

Additionally, in her cross motion to compel, Ms. Lively already informed this court that she intends to respond in Nevada (by August 18th, Ms. Hudson wrote).

Therefore, it is unclear to me why your Honor feels the need to obstruct her plans and intervene.

Respectfully, I request an extension from this court in ruling on my motion here and Ms. Lively's opposition and cross motion until the court in Las Vegas finishes letting this all play out in Nevada, which I believe is the appropriate venue.

As already mentioned, Ms. Lively has informed you of her intent to respond in Nevada. There is a great likelihood that she may move that court to transfer the decision to you at the SDNY, as she did with her subpoena against Justin Baldoni's lawyer, Bryan Freedman, in California. I am aware of the possibility that you could end up ruling on my Motion To Quash, an outcome which would not be ideal - for reasons I have previously stated with this court and publicly.

However, this latest move - to force my hand now in your court - seems highly improper. And unnecessary, as I explained why above.

Also - in your order today, you write: "Given Lavandeira's pro se status and the special solicitude that status is owed, the Court advises Lavandeira that, should he fail to respond to Lively's cross motion and should the Court determine that it has jurisdiction to compel, Lavandeira risks waiving any arguments that Lively's motion is improper."

I write requesting needed clarity, as a pro se movant representing myself without a lawyer.

To properly respond to your Honor's order, it is *imperative* that I know as soon as possible if this court has jurisdiction over me and/or jurisdiction to compel.

You said today about me: "should the Court determine that it has jurisdiction to compel".

I legitimately do not believe I can respond fairly or appropriately until this very critical issue is clarified.

Accordingly, I *also* move this court for an extension to respond to Ms. Lively's opposition to my motion and cross-motion to compel until your Honor gives me the clarity that I am seeking and is needed. Do you and this court have jurisdiction over me to compel?

If the above does not please or satisfy your Honor, I ALSO now am *formally requesting* with you and this court to withdraw my referenced motion for a Protective Order. Withdrawing the request for a Protective Order would thusly render Ms. Lively's opposition and cross-motion to compel as moot.

Awaiting your answers and with deepest gratitude for the clarity and clarifications.

Respectfully submitted,

/s/ Mario Armando Lavandeira, Jr.

Mario Armando Lavandeira, Jr.

aka Perez Hilton